

# **JAFFE EXHIBIT 130**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

\_\_\_\_\_  
WAYMO LLC,  
  
Plaintiff,  
  
vs.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO  
TRUCKING LLC,  
  
Defendants.  
\_\_\_\_\_

)  
)  
)  
)  
)  
) Case No.  
) 3:17-cv-00939-WHA  
)  
)  
)  
)  
)  
)  
)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY  
VIDEOTAPED DEPOSITION OF WILLIAM GROSSMAN  
San Francisco, California  
Friday, March 24, 2017  
Volume I

Reported by: SUZANNE F. GUDELJ  
CSR No. 5111  
Job No. 2577640  
PAGES 1 - 54

1 A No.

2 Q Elaborate.

3 A Because as I --

4 MR. JAFFE: Sorry. Objection. Form.

5 BY MR. GONZALEZ: 10:15:26

6 Q Can you clarify what you mean?

7 A Can you repeat the question?

8 Q Yeah. You said you thought it was  
9 interesting because of the nature of the content.

10 A Yes. 10:15:40

11 Q So I will use your words. What did you  
12 mean when you said "the nature of the content"?

13 A Well, after looking at the content in more  
14 detail, I realized that it was very similar to -- to  
15 Waymo's -- some of Waymo's laser systems. 10:15:57

16 Q So what was similar?

17 A The shape of the board.

18 Q I don't have an engineering degree, so I  
19 want to make sure I'm understanding what you're  
20 saying. If you look -- I see some pictures on the 10:16:15  
21 last two pages of this exhibit. Is that what you're  
22 referring to?

23 A Yes.

24 Q And what is it about the shape of the board  
25 that you found interesting? 10:16:27

Page 16

1           A     It looked very similar to designs we have  
2     in-house.

3           Q     And how do you know that?

4           A     I know that because previously I had talked  
5     with the laser team, and I'd -- I just happened to     10:16:42  
6     have a conversation about this particular part of  
7     the system. And it's -- it's a very striking shape,  
8     and you just remember it, and so when I saw it, I  
9     immediately recognized it.

10          Q     Was there anything in particular about the     10:16:58  
11     shape that -- that caught your attention?

12          A     The angles and sides of the PCB.

13          Q     Was there anything else that you found  
14     interesting about the email and document other than  
15     the shape?                                                     10:17:17

16          A     No.

17          Q     And when you say "the shape," again, I'm  
18     just trying to make sure I understand you.

19          A     Yep.

20          Q     We'll take the one on the last page. The     10:17:29  
21     last page of the exhibit has one -- what do you call  
22     this, a board?

23          A     Yeah, a PCB.

24          Q     Okay. PCB?

25          A     Yeah.                                                 10:17:39